

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ABBOTT GMBH & CO., KG,)	
ABBOTT BIORESEARCH CENTER, INC.,)	
AND ABBOTT BIOTECHNOLOGY LTD.,)	C.A. No. 4:09-CV-11340 (FDS)
)	
Plaintiffs,)	
)	JURY TRIAL DEMANDED
v.)	
)	
CENTOCOR ORTHO BIOTECH, INC. AND)	
CENTOCOR BIOLOGICS, LLC.,)	
)	
Defendant.)	

**DECLARATION OF ANGELA VERRECCHIO IN SUPPORT OF CENTOCOR'S
DAUBERT MOTION TO EXCLUDE TESTIMONY OF ABBOTT EXPERT JOAN
ELLIS AND MEMORANDUM IN SUPPORT**

I, Angela Verrecchio, declare and state as follows:

1. I am counsel at the law firm Akin Gump Strauss Hauer and Feld LLP, counsel for Centocor Ortho Biotech, Inc. and Centocor Biologics, LLC, and as such I am familiar with the facts stated herein.
2. Attached hereto as Exhibit 1 is a true and correct copy of the July 22, 2011 Rebuttal Expert Report of Dr. Joan Ellis, Ph.D. (***FILED UNDER SEAL***).
3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from the August 2, 2011 deposition of Dr. Joan Ellis, Ph.D. (***FILED UNDER SEAL***).
4. Attached hereto as Exhibit 3 is a true and correct copy of *Apple, Inc. v. Motorola, Inc.*, No. 1:11-cv-08540, 2012 WL 195960 (N.D. Ill. May 22, 2012).
5. Attached hereto as Exhibit 4 is a true and correct copy of *Southard v. United Regional Health Care System, Inc.*, No. 7-06-CV-11-L, 2008 WL 4489692 (N.D. Tex. 2008).

6. Attached hereto as Exhibit 5 is a true and correct copy of *Hem, Inc. v. Behringer Saws, Inc.*, No. 00-CV-0331-EA (J), 2002 WL 34698060 (N.D. Okla. 2002).

I declare under penalty of perjury that the foregoing is true and correct.

Date: June 29, 2012

A handwritten signature in black ink, appearing to read "Angela Verrecchio", written over a light blue horizontal line.

Angela Verrecchio

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Declaration of Angela Verrecchio in Support of Centocor's Daubert Motion to Exclude Testimony of Abbott Expert Joan Ellis and Memorandum in Support along with exhibits cited therein was electronically mailed to counsel of record on June 29, 2012.

A handwritten signature in black ink, appearing to read "Angela Verrecchio", is positioned above a horizontal line.

Angela Verrecchio